

# HARRIS

## INJURY LAW

February 23, 2022

**VIA TELECOPY**  
**833.905.1738**

Ms. Michelle E. Gray, Claims Department  
**PROGRESSIVE INSURANCE**  
747 Alpha Drive  
Highland Heights, OH 44143

Re: **Erlinda Zacarias, et al. v. Ernest Johnson; Jowa Tax and Finance, Inc.**

Case No. : A-22-846332-C  
Your Insured : Ernest Johnson, Jr. / Jowa Tax & Finance  
Policy/Claim : 035554226-0 / 21-8395745  
Claimant : Erlinda Zacarias / [REDACTED] / Francisco Rocha-Briceno  
Our Case No. : 228543  
Date of Loss : 06.08.2021

Dear Ms. Gray:

Attached is a copy of the Complaint filed in the above-entitled matter for your information. Also attached is a file-stamped copy of the Default, which has been entered by the Eighth Judicial District Court, Clark County, Nevada, against your client, Jowa Tax and Finance, Inc. An answer is due from your client, Ernest Johnson, on or before February 28, 2022. If no answer is received, we will request the Court to enter a Default against Mr. Johnson.

Sincerely,

**HARRIS & HARRIS, INJURY LAWYERS**

**BRIAN K. HARRIS**  
*dictated & approved*

Brian K. Harris, Esq.

BKH/pf  
Attachments

**Brian K. Harris ♦**  
**Christian N. Griffin \***

♦ Admitted to practice in Nevada,  
Utah, Arizona, and  
the United States Supreme Court

\* Also admitted in California


Multi-Million Dollar Advocate Forum  
Super Lawyers - Nevada  
ATLA Top 100 Trial Lawyers  
Verdicts Club - Platinum Member  
Elite Lawyers of America  
Martindale-Hubbell AV Preeminent Rating

[www.harrislawyers.com](http://www.harrislawyers.com)

1645 Village Center Circle, Suite 60, Las Vegas, Nevada 89134

Phone : 702.384.1414 Fax : 702.880.4528

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1/6/2022 1:14 PM  
Steven D. Grierson  
CLERK OF THE COURT



**COMP**  
**BRIAN K. HARRIS, ESQ.**  
Nevada Bar No. 7737  
**HARRIS INJURY LAW**  
1645 Village Center Circle, Suite 60  
Las Vegas, Nevada 89134  
702.880.4529 - Telephone  
702.880.4528 - Facsimile  
[Brian@harrislawyers.com](mailto:Brian@harrislawyers.com)  
*Attorneys for Plaintiffs*

CASE NO: A-22-846332-C  
Department 4

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

ERLINDA ZACARIAS; ERLINDA ZACARIAS  
as parent and guardian of [REDACTED]  
FRANCISCO ROCHA

Case No.  
Dept. No.

Plaintiffs,

vs.

ERNEST JOHNSON; JOWA TAX AND  
FINANCE, INC.; DOES 1 through 10; ROE  
CORPORATIONS 11-20, inclusive,

Defendants.

**COMPLAINT**

Plaintiffs allege as follows:

1. That at all times relevant hereto, Plaintiff **ERLINDA ZACARIAS**, was and is a resident of Clark County, State of Nevada.
2. That at all times relevant hereto, Plaintiff **ERLINDA ZACARIAS** as parent and guardian of [REDACTED] was and is a resident of Clark County, State of Nevada.
3. At all times mentioned herein, Plaintiff **FRANCISCO ROCHA** was and is a resident of Clark County, Nevada.
4. That at all times relevant hereto, Defendant **ERNEST JOHNSON**, was and is a resident of Harris County, State of Texas.

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**HARRIS**  
**INJURY LAW**

# HARRIS

## INJURY LAW

5. That at all times relevant hereto, Defendant **JOWA TAX AND FINANCE, INC.** is a Foreign Corporation doing business in Las Vegas, Clark County, Nevada.

6. That the identities of Defendants, DOES 1 through 10 and ROE CORPORATIONS 11 through 20, are unknown at this time and may be individuals, partnerships or corporations. Plaintiff alleges that each of the Defendants designated herein as DOE or ROE CORPORATION is responsible in some manner for the damages herein alleged. Plaintiffs request leave of the Court to amend this Complaint to name the Defendants specifically when their identities become known.

7. That all the facts and circumstances that give rise to the subject lawsuit occurred in Clark County, Nevada.

8. At all times relevant hereto, Defendants were the drivers, contractors, maintainers, owners, managers, inspectors, supervisors and controllers of the subject semi truck.

9. On or about June 8, 2021, Defendants, while in the course and scope of their employment and agency with other Defendants, negligently failed to properly control and operate the subject semi truck and further failed to use due care to Plaintiffs, by rear-ending the vehicle they were occupying causing serious injuries.

10. As a direct and proximate result, Plaintiffs were seriously and permanently injured to their general damage in an amount in excess of **FIFTEEN THOUSAND DOLLARS (\$15,000.00)**.

11. As a further direct and proximate result, Plaintiffs incurred expenses for medical care and treatment and will incur expenses for future medical care and treatment.

12. As a further direct and proximate result, Plaintiffs sustained a loss of earnings and/or earning capacity.

13. As a further direct and proximate result, Plaintiffs were forced to retain the services of **HARRIS & HARRIS** to prosecute this matter.

# HARRIS

## INJURY LAW

WHEREFORE, Plaintiffs pray judgment of this Court as follows:

**WHEREFORE** Plaintiffs pray for Judgment against the Defendants, and each of them, as follows:

1. For general and compensatory damages in an amount in excess of **FIFTEEN THOUSAND DOLLARS (\$15,000.00)**;

2. Damages for cost of medical care and treatment and costs incidental thereto in an amount in excess of **FIFTEEN THOUSAND DOLLARS (\$15,000.00)**;

3. Damages for future cost of medical care and treatment and costs incidental thereto in an amount in excess of **FIFTEEN THOUSAND DOLLARS (\$15,000.00)**;

4. Damages for lost earnings and loss of future earning capacity in an amount in excess of **FIFTEEN THOUSAND DOLLARS (\$15,000.00)**;

5. Damages for past and future household services in excess of **FIFTEEN THOUSAND DOLLARS (\$15,000.00)**;

6. Damages for Plaintiffs' emotional distress, including, but not limited to pain and suffering and hedonic damages in an amount in excess of **FIFTEEN THOUSAND DOLLARS (\$15,000.00)**;

7. For reasonable attorney fees, costs of suit and interest incurred herein; and

8. For such other and further relief as the Court deems just and proper.

DATED this 6 day of January, 2022.

**HARRIS INJURY LAW**

By

**BRIAN K. HARRIS, ESQ.**

Nevada Bar No. 7737

1645 Village Center Circle, Suite 60

Las Vegas, Nevada 89134

702.880.4529 - Telephone

702.880.4528 - Facsimile

*Attorneys for Plaintiffs*

Electronically Filed  
2/16/2022 10:32 AM  
Steven D. Grierson  
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**DFLT**  
**BRIAN K. HARRIS, ESQ.**  
Nevada Bar No. 7737  
**HARRIS INJURY LAW**  
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Las Vegas, Nevada 89134  
702.880.4529 - Telephone  
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[Brian@harrislawyers.com](mailto:Brian@harrislawyers.com)  
*Attorneys for Plaintiffs*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

ERLINDA ZACARIAS; ERLINDA ZACARIAS  
as parent and guardian of [REDACTED]  
FRANCISCO ROCHA

Case No. A-22-846332-C  
Dept. No. 4

Plaintiffs,

vs.

ERNEST JOHNSON; JOWA TAX AND  
FINANCE, INC.; DOES 1 through 10; ROE  
CORPORATIONS 11-20, inclusive,

Defendants.

**DEFAULT**

It appearing from the files and records in the above-entitled action that **JOWA TAX AND FINANCE, INC.**, Defendant herein, being duly served with a copy of the Summons and Complaint on **JANUARY 13, 2022**; that more than 21 days, exclusive of the day of service, having expired since service upon Defendant **JOWA TAX AND FINANCE, INC.**; that no answer or other appearance having been filed and no further time having been granted, the

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**HARRIS**

**INJURY LAW**

# HARRIS

## INJURY LAW

1 default of the above-named Defendant for failing to answer or otherwise plead to Plaintiffs'  
2 Complaint is hereby entered.

STEVEN D. GRIERSON  
COURT EXECUTIVE

By: 

Deputy Clerk  
A-22-846332-C

Date

Michelle McCarthy 2/18/2022

  
HARRIS INJURY LAW

By:

**BRIAN K. HARRIS, ESQ.**

Nevada Bar No. 7737

1645 Village Center Circle, Suite 60

Las Vegas, Nevada 89134

702.880.4529 - Telephone

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*Attorneys for Plaintiffs*

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1/6/2022 1:15 PMElectronically Filed  
1/20/2022 8:59 AM  
Steven D. Grierson  
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## DISTRICT COURT

## CLARK COUNTY, NEVADA

CASE NO: A-22-846332-C

Case No.  
Dept. No.

Department 4

ERLINDA ZACARIAS; ERLINDA ZACARIAS  
as parent and guardian of [REDACTED]  
FRANCISCO ROCHA

Plaintiffs,

vs.

ERNEST JOHNSON; JOWA TAX AND  
FINANCE, INC.; DOES 1 through 10; ROE  
CORPORATIONS 11-20, inclusive,

Defendants.

## SUMMONS - CIVIL

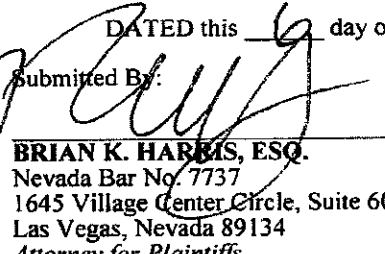
**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR  
BEING HEARD UNLESS YOU RESPOND WITHIN 21 DAYS. READ THE INFORMATION BELOW.****TO THE DEFENDANT(S):** A civil Complaint has been filed by the Plaintiff(s) against you for the relief set forth  
in the Complaint.**JOWA TAX AND FINANCE, INC.  
c/o JOHN WACHIRA, REGISTERED AGENT**  
[REDACTED]

1. If you intend to defend this lawsuit, within 21 days after this Summons is served on you, exclusive of the day of service, you must do the following:
  - (a) File with the Clerk of this Court, whose address is shown below, a formal written response to the Complaint in accordance with the rules of the Court, with the appropriate filing fee.
  - (b) Serve a copy of your response upon the attorney whose name and address is shown below.
2. Unless you respond, your default will be entered upon application of the Plaintiff(s) and failure to so respond will result in a judgment of default against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint.
3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members and legislators each have **45 days after service of this Summons within which to file an Answer or other responsive pleading to the Complaint.**

DATED this 6 day of January, 2022.

Submitted By:

  
**BRIAN K. HARRIS, ESQ.**  
 Nevada Bar No. 7737  
 1645 Village Center Circle, Suite 60  
 Las Vegas, Nevada 89134  
 Attorney for Plaintiffs

05.25.16

STEVEN D. GRIERSON, CLERK OF THE COURT

By

Deputy Clerk

Regional Justice Center  
200 Lewis Avenue  
Las Vegas, Nevada 89155

1/7/2022

Laurie Williams



**AFFT**

Harris & Harris Lawyers  
 Brian K. Harris, Esq.  
 1645 Village Center Circle, Suite 60  
 Las Vegas, NV 89134  
 State Bar No.: 7737  
 Attorney(s) for: Plaintiff(s)

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**DISTRICT COURT  
 CLARK COUNTY, NEVADA**

Case No.:

**A-22-846332-C**Dept. No.: **4****Erlinda Zacarias; et al****Plaintiff(s)****vs****Ernest Johnson; et al****Defendant(s)**

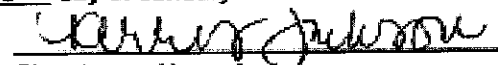
Date:

Time:

**AFFIDAVIT OF SERVICE**

Kerry Jackson, being duly sworn deposes and says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age and not a party to or interested in the proceeding in which this affidavit is made. The affiant received 1 copy(ies) of the Summons - Civil: Complaint on the 12th day of January, 2022 and served the same on the 13th day of January, 2022 at 10:40 am by serving the Defendant, Iowa Tax and Finance, Inc. by personally delivering and leaving a copy at Registered Agent: John Wachira, [REDACTED] with Precious Dixon, Office Manager pursuant to NRS 14.020 as a person of suitable age and discretion at the above address, which address is the address of the registered agent as shown on the current certificate of designation filed with the Secretary of State. Pursuant to NRS 239B.030 this document does not contain the social security number of any person.

I declare under penalty of perjury under the law  
 of the state of Nevada that the foregoing is true and correct.  
 Executed this 13 day of January 2022



Signature: - Kerry Jackson

Process Server

WorkOrderNo 2200224





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## DISTRICT COURT

## CLARK COUNTY, NEVADA

1  
2  
3 ERLINDA ZACARIAS; ERLINDA ZACARIAS )  
4 as parent and guardian of [REDACTED] )  
5 FRANCISCO ROCHA )

CASE NO: A-22-846332-C  
Case No. Department 4  
Dept. No.

6  
7 Plaintiffs,

8 vs.

9 ERNEST JOHNSON; JOWA TAX AND )  
10 FINANCE, INC.; DOES 1 through 10; ROE )  
11 CORPORATIONS 11-20, inclusive, )

12 Defendants.

## SUMMONS - CIVIL

13 NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR  
14 BEING HEARD UNLESS YOU RESPOND WITHIN 21 DAYS. READ THE INFORMATION BELOW.

15 TO THE DEFENDANT(S): A civil Complaint has been filed by the Plaintiff(s) against you for the relief set forth  
16 in the Complaint.

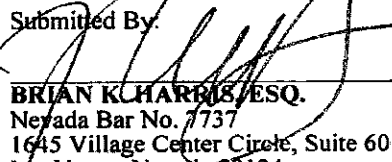
17 ERNEST JOHNSON  
18 [REDACTED]

- 19 1. If you intend to defend this lawsuit, within 21 days after this Summons is served on you, exclusive of the  
20 day of service, you must do the following:  
21 (a) File with the Clerk of this Court, whose address is shown below, a formal written response to  
22 the Complaint in accordance with the rules of the Court, with the appropriate filing fee.  
23 (b) Serve a copy of your response upon the attorney whose name and address is shown below.  
24 2. Unless you respond, your default will be entered upon application of the Plaintiff(s) and failure to so  
25 respond will result in a judgment of default against you for the relief demanded in the Complaint, which  
26 could result in the taking of money or property or other relief requested in the Complaint.  
27 3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your  
28 response may be filed on time.

The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members and legislators each have 45 days after service of this Summons within which to file an Answer or other responsive pleading to the Complaint.


DATED this 6 day of January, 2022.

Submitted By:

  
BRIAN K. HARRIS, ESQ.  
Nevada Bar No. 7737  
1645 Village Center Circle, Suite 60  
Las Vegas, Nevada 89134  
Attorney for Plaintiffs

STEVEN D. GRIERSON, CLERK OF THE COURT

By:

  
Deputy Clerk Date 1/7/2022  
Regional Justice Center  
200 Lewis Avenue  
Las Vegas, Nevada 89155

05.25.16

1 **AFFT**  
 2 Harris & Harris Lawyers  
 3 Brian K. Harris, Esq.  
 4 1645 Village Center Circle, Suite 60  
 5 Las Vegas, NV 89134  
 6 State Bar No.: 7737  
 7 Attorney(s) for: Plaintiff(s)

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**DISTRICT COURT  
 CLARK COUNTY, NEVADA**

Case No.: **A-22-846332-C**

Dept. No.: **4**

8  
 9  
 10 **Erlinda Zacarias; et al**  
 11 **vs**  
 12 **Ernest Johnson; et al**

**Plaintiff(s)**

**Defendant(s)**

Date:

Time:

**AFFIDAVIT OF DUE DILIGENCE**

15 **Alexis Nicole Turner**, being duly sworn deposes and says: That Affiant is and was on the day when she received the within  
 16 action, a citizen of the United States, over 18 years of age, licensed to serve civil process in the State of Nevada under license  
 17 #604, and not a party to or interested in, the within action: That the affiant received the within **Summons - Civil: Complaint**,  
 18 on the **7th** day of **January**, **2022** and that attempts were made to locate the **Defendant, Ernest Johnson**, within  
 19 the County of **Clark**, State of **Nevada**.

20 Affiant affirms that during the period of January 7th, 2022 - February 3, 2022, a diligent effort was made to serve and locate a  
 21 current address for the defendant, Ernest Johnson. See Affidavits of Attempted Service regarding efforts to serve defendant at

22 [REDACTED] and [REDACTED]

23  
 24 Inquiries with local phone and Nevada and Texas cross directories were inconclusive due to the many possible matches found by  
 25 name match for an Ernest Johnson. Affiant was unable to confirm a possible phone/address listing. Inquiries with Harris County,  
 26 Texas and Clark County Assessor offices were also made. Affiant was unable to confirm a record of the defendant owning a  
 27 residence in either county.

28  
 29 Inquiries were run with Texas and Clark County Voter Registration listings. Affiant found no match for the defendant through Clark  
 30 County Voter Registration listings. Affiant was able to match the defendant by name, Ernest Johnson, county of Harris, date of  
 31 birth (DOB) [REDACTED] 1950 and zip code [REDACTED] through Texas Voter Registration listings. Defendant shows to be an "active" status  
 32 voter at [REDACTED]

33  
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 35  
 36 **///**

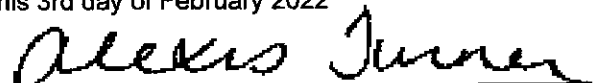
Legal Process Service, 724 S. 8th Street, Las Vegas, NV 89101 (702) 471-7255

1 Inquiries with various national search engines were run. Affiant was able to match defendant by name, Ernest  
2 Johnson and last known address of [REDACTED]. Information obtained from  
3 these inquiries show that the defendant, Ernest Johnson is aka Ernest Johnson Jr. DOB is showing [REDACTED] 1950. A  
4 Texas issued drivers license lists DL# [REDACTED]. Results of these inquiries are reporting the most current address to  
5 be [REDACTED]. These inquiries also provided a few possible phone numbers.  
6 Contact was tried c/o the phone numbers obtained; [REDACTED] (kept ringing until it just eventually disconnected),  
7 [REDACTED] (rang and eventually went to a generic voicemail, in which a detailed voicemail was left advising of  
8 the nature of the documents), [REDACTED] (rang and eventually went to a generic voicemail, in which a detailed  
9 voicemail was left advising of the nature of the documents), [REDACTED] (rang and an automated message  
10 message stated, "please enter your remote access code.").

11  
12 Postal inquiries were submitted for the addresses listed in this affidavit in an effort to confirm an address as current  
13 for the defendant and/or to obtain a forwarding address. To date, the US Postmaster has failed to respond. Letters  
14 were also mailed from Las Vegas, NV, first-class postage prepaid to the subject at the addresses listed in this  
15 affidavit and advised of the nature of the document. Affiant affirms that there has been no response to letters mailed.

16  
17 Affiant affirms that a due and diligent effort was made to serve and to locate a current address for the defendant,  
18 Ernest Johnson, and that based on results of attempts to serve, the most current address found for the defendant is  
19 [REDACTED]  
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I declare under penalty of perjury under the law  
of the state of Nevada that the foregoing is true and correct.  
Executed this 3rd day of February 2022



Alexis Nicole Turner #: R-2020-01936  
Legal Process Service, License # 604  
Work Order 2200663



**AFFT**

Harris & Harris Lawyers  
 Brian K. Harris, Esq.  
 1645 Village Center Circle, Suite 60  
 Las Vegas, NV 89134  
 State Bar No.: 7737  
 Attorney(s) for: Plaintiff(s)

**DISTRICT COURT  
 CLARK COUNTY, NEVADA**

Case No.:  
**A-22-846332-C**

Dept. No.:  
**4**

**Erlinda Zacarias; et al**  
**vs**  
**Ernest Johnson; et al**

**Plaintiff(s)**

**Defendant(s)**

Date:  
 Time:

**AFFIDAVIT OF  
 ATTEMPTED SERVICE**

**Kerry Jackson**, being duly sworn deposes and says: That Affiant is and was on the day when she attempted to serve the within action, a citizen of the United States, over 18 years of age, and not a party to or interested in, the within action: That the affiant received the within Summons - Civil Complaint on the 13th day of January, 2022 and attempted to effect service on Ernest Johnson at the following address(es): [REDACTED]

Below are listed that date(s) and time(s) of attempted service.

<u>Date</u>	<u>Time</u>	<u>Address</u>	<u>Outcome</u>
1/13/22	12:30pm As Above		Address corresponds to a residence. There was no answer at the door and no visible activity or sounds. A Ford SUV was seen in the driveway with plate # [REDACTED] and a notice was left on the garage door. Affiant tried to check with three neighbors, but only a man (senior citizen) across the street answered the door. The man stated that he did not know who lived at the address. As Affiant left, the next door neighbor came out, who was a kid walking his dog, and stated that he just moved there and doesn't know who lived next door.
1/17/22	7:30pm As Above		There was no answer at the door. Another vehicle was seen on the property, which was a medical transport truck with plate # [REDACTED]. The porch lights were seen on and the notice previously left on the garage door was gone. A package was seen at the front door addressed to Regina Hyde Scott. Affiant tried ringing the doorbells of two neighbors, but got no answer.
1/18/22		Incoming Call:	Affiant received a phone call from Mr. Wachira of Jowa Tax and Finance, in which he was asked for help regarding the whereabouts of the subject. Mr. Wachira stated that he was out of the country, but would still see what he could do. Affiant sent a text to Mr. Wachira later on, but did not receive a reply.
1/19/22	9:40am As Above		There was no answer at the door and the window blinds were seen open. There was no answer at the neighbors homes. Affiant made an outgoing call to [REDACTED] and spoke with Precious at Jowa Tax and Finance, who stated that she would try to make contact with the subject and have him call Affiant in 20-30 minutes. Affiant let Precious know that she was sitting outside of the subject's house and will wait before reattempting the doorbell again. After

waiting 20 minutes, Affiant tried again at the residence and there was still no answer at the door. Affiant noted that when she pulls up to the residence, the internet on her phone asks "want to join THE JOHNSONS wifi."

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.  
Executed this 24 day of January, 2021.

Kerry Jackson

Kerry Jackson

Process Server

WorkOrderNo 2200223



**AFFT**  
**Harris & Harris Lawyers**  
**Brian K. Harris, Esq.**  
**1645 Village Center Circle, Suite 60**  
**Las Vegas, NV 89134**  
**State Bar No.: 7737**  
**Attorney(s) for: Plaintiff(s)**

**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

Case No.:  
**A-22-846332-C**  
 Dept. No.: **4**

**Erlinda Zacarias; et al**  
**vs**  
**Ernest Johnson; et al**

**Plaintiff(s)**

**Defendant(s)**

Date:  
 Time:

**AFFIDAVIT OF  
 ATTEMPTED SERVICE**

Kerry Jackson, being duly sworn deposes and says: That Affiant is and was on the day when she attempted to serve the within action, a citizen of the United States, over 18 years of age, and not a party to or interested in, the within action. Pursuant to NRS 239B.030 this document does not contain the social security number of any person. That the affiant received the within Summons - Civil Complaint on the 12th day of January, 2022 and attempted to effect service on Ernest Johnson at the following address(es): [REDACTED] Below are listed the date(s) and time(s) of attempted service.

<u>Date</u>	<u>Time</u>	<u>Address</u>	<u>Outcome</u>
1/13/22	12:40pm	As Above	Address corresponds to a residence. Affiant confirmed with Ms. Lynn that the subject rented the residence from a lady named Brenda and he moved out two years ago when his lease was up. No further information provided.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct. Executed on this 24 day of January, 2022.

Kerry Jackson  
**Kerry Jackson**

Process Server

WorkOrderNo 2200223



1/27/22, 10:28 AM

Am I Registered?

TEXAS SECRETARY OF STATE

MY VOTER PORTAL  
TEXAS ELECTION ADMINISTRATION SYSTEM

## Voter Information

Name: ERNEST JOHNSON JR

Address: [REDACTED]

Gender: MALE

Valid From: 01/01/2022

Effective Date of Registration: 09/14/2010

Voter Status: ACTIVE

County: HARRIS

Precinct: 757

VUID: [REDACTED]

[Change your Address](#)

## Upcoming Elections (Select Election for available polling information)

[11/08/2022-2022 NOVEMBER 8TH GENERAL ELECTION](#)[03/01/2022-2022 MARCH 1ST REPUBLICAN PRIMARY](#)[03/01/2022-2022 MARCH 1ST DEMOCRATIC PRIMARY](#)

\*\*\*Eligibility is determined by Effective Date of  
Registration (Must be on or before Election Day)

**Please Note:** Polling places are subject to change. Always check your designated polling place location via this website or by contacting your county prior to going to vote.

## ADDITIONAL QUESTIONS and FAQ

**Note:** Any questions now that you see your voter registration status? On Suspense? Don't live at that address anymore? Not sure what to do next? Check out our FAQ.

[Back](#)



**AFFT**

Harris & Harris Lawyers  
 Brian K. Harris, Esq.  
 1645 Village Center Circle, Suite 60  
 Las Vegas, NV 89134  
 State Bar No.: 7737  
 Attorney(s) for: Plaintiff(s)

Electronically Filed  
 2/3/2022 3:50 PM  
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**DISTRICT COURT  
 CLARK COUNTY, NEVADA**

**Erlinda Zacarias; et al**  
**vs**  
**Ernest Johnson; et al**

**Plaintiff(s)**

**Defendant(s)**

Case No.:  
**A-22-846332-C**  
 Dept. No.:  
**4**

Date:  
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**AFFIDAVIT OF  
 ATTEMPTED SERVICE**

**Kerry Jackson**, being duly sworn deposes and says: That Affiant is and was on the day when she attempted to serve the within action, a citizen of the United States, over 18 years of age, and not a party to or interested in, the within action: That the affiant received the within Summons - Civil Complaint on the 13th day of January, 2022 and attempted to effect service on Ernest Johnson at the following address(es): [REDACTED]

Below are listed that date(s) and time(s) of attempted service.

<u>Date</u>	<u>Time</u>	<u>Address</u>	<u>Outcome</u>
1/13/22	12:30pm As Above		Address corresponds to a residence. There was no answer at the door and no visible activity or sounds. A Ford SUV was seen in the driveway with plate # [REDACTED] and a notice was left on the garage door. Affiant tried to check with three neighbors, but only a man (senior citizen) across the street answered the door. The man stated that he did not know who lived at the address. As Affiant left, the next door neighbor came out, who was a kid walking his dog, and stated that he just moved there and doesn't know who lived next door.
1/17/22	7:30pm As Above		There was no answer at the door. Another vehicle was seen on the property, which was a medical transport truck with plate # [REDACTED]. The porch lights were seen on and the notice previously left on the garage door was gone. A package was seen at the front door addressed to Regina Hyde Scott. Affiant tried ringing the doorbells of two neighbors, but got no answer.
1/18/22		Incoming Call:	Affiant received a phone call from Mr. Wachira of Jowa Tax and Finance, in which he was asked for help regarding the whereabouts of the subject. Mr. Wachira stated that he was out of the country, but would still see what he could do. Affiant sent a text to Mr. Wachira later on, but did not receive a reply.
1/19/22	9:40am As Above		There was no answer at the door and the window blinds were seen open. There was no answer at the neighbors homes. Affiant made an outgoing call to [REDACTED] and spoke with Precious at Jowa Tax and Finance, who stated that she would try to make contact with the subject and have him call Affiant in 20-30 minutes. Affiant let Precious know that she was sitting outside of the subject's house and will wait before reattempting the doorbell again. After

waiting 20 minutes, Affiant tried again at the residence and there was still no answer at the door. Affiant noted that when she pulls up to the residence, the internet on her phone asks "want to join THE JOHNSONS wifi."

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.  
Executed this 24 day of January, 2021.

Kerry Jackson

Kerry Jackson  
Process Server

WorkOrderNo 2200223



1 **AFPT**  
 2 **Harris & Harris Lawyers**  
 3 **Brian K. Harris, Esq.**  
 4 **1645 Village Center Circle, Suite 60**  
 5 **Las Vegas, NV 89134**  
 6 **State Bar No.: 7737**  
 7 **Attorney(s) for: Plaintiff(s)**

8 **DISTRICT COURT**  
 9 **CLARK COUNTY, NEVADA**

10 **Case No.:**  
 11 **A-22-846332-C**

12 **Dept. No.:**  
 13 **4**

14 **Erlinda Zacarias; et al**  
 15 **vs**  
 16 **Ernest Johnson; et al**

17 **Plaintiff(s)**

18 **Defendant(s)**

19 **Date:**  
 20 **Time:**

21 **AFFIDAVIT OF**  
 22 **ATTEMPTED SERVICE**

23 Kerry Jackson, being duly sworn deposes and says: That Affiant is and was on the day when she attempted to serve the within  
 24 action, a citizen of the United States, over 18 years of age, and not a party to or interested in, the within action. Pursuant to NRS  
 25 239B.030 this document does not contain the social security number of any person. That the affiant received the within  
 26 Summons - Civil Complaint on the 12th day of January, 2022 and attempted to effect service on Ernest Johnson at the  
 27 following address(es): [REDACTED] Below are listed the date(s) and time(s) of attempted  
 28 service.

29 **Date** **Time** **Address**  
 30 **1/13/22** **12:40pm** **As Above**

31 **Outcome**

32 Address corresponds to a residence. Affiant confirmed with Ms. Lynn that  
 33 the subject rented the residence from a lady named Brenda and he moved  
 34 out two years ago when his lease was up. No further information provided.

35 I declare under penalty of perjury under the law of the State of  
 36 Nevada that the foregoing is true and correct. Executed on this  
 37 24 day of January, 2022.


38 Kerry Jackson  
 39 **Kerry Jackson**

40 **Process Server**

41 **WorkOrderNo 2200223**



Electronically Filed  
1/27/2022 1:22 PM  
Steven D. Grierson  
CLERK OF THE COURT



**AFOC**  
**BRIAN K. HARRIS, ESQ.**  
Nevada Bar No. 7737  
**HARRIS INJURY LAW**  
1645 Village Center Circle, Suite 60  
Las Vegas, Nevada 89134  
702.880.4529 - Telephone  
702.880.4528 - Facsimile  
[Brian@harrislawyers.com](mailto:Brian@harrislawyers.com)  
*Attorneys for Plaintiffs*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

ERLINDA ZACARIAS; ERLINDA ZACARIAS  
as parent and guardian of [REDACTED]  
FRANCISCO ROCHA

Case No. A-22-846332-C  
Dept. No. 4

Plaintiffs,

vs.

ERNEST JOHNSON; JOWA TAX AND  
FINANCE, INC.; DOES 1 through 10; ROE  
CORPORATIONS 11-20, inclusive,

Defendants.

**PLAINTIFFS' AFFIDAVIT OF COMPLIANCE**

STATE OF NEVADA )  
 ) ss.  
COUNTY OF CLARK )

**PEGGY A. FROMHART**, being duly sworn says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age, not a party to or interested in the proceeding in which this affidavit is made. That affiant received ONE (1) copy of the Summons and Complaint, on the 27th day of JANUARY, 2022, and served the same on the 27TH day of JANUARY, 2022 by:

....

....

....

....

(Affiant must complete the appropriate paragraph)

1. delivering and leaving a copy with the defendant \_\_\_\_\_  
at \_\_\_\_\_.

2. serve the defendant \_\_\_\_\_ by personally delivering and  
leaving a copy with \_\_\_\_\_, a person of suitable age and  
discretion residing at the defendant's usual place of abode located at  
\_\_\_\_\_.

(Use paragraph 3 for serve upon agent, completing A or B)

3. serving the defendant \_\_\_\_\_ by personally delivering  
and leaving a copy at \_\_\_\_\_.

a. With \_\_\_\_\_ as \_\_\_\_\_, an  
agent lawfully designated by statute to accept service of process;

b. With \_\_\_\_\_, pursuant to NRS 14.020 as a person  
of suitable age and discretion at the above address, which address is the address  
of the resident agent as shown on the current certificate of designation filed with  
the Secretary of State.

4. personally depositing a copy in a mail box of the United States Post Office, enclosed in a  
sealed envelope postage prepaid (check appropriate method):

  X   FIRST CLASS MAIL  
  X   CERTIFIED, FIRST-CLASS RETURN RECEIPT REQUESTED  
\_\_\_\_\_ registered mail, return receipt requested

addressed to the defendant **ERNEST JOHNSON, JR.** at the defendant's last known address  
which is \_\_\_\_\_

SUBSCRIBED AND SWORN to before me this

27<sup>th</sup> day of JANUARY, 2022

Melissa A. Sutor  
NOTARY PUBLIC

Peggy Furber  
Signature of person making service



PAGE 21/28 \* RCVD AT 2/23/2022 1:14:29 PM [Eastern Standard Time] \* SVR:SRRFXP14/2 \* DNIS:8339051738 \* CSID: \* ANI:7026656564 \* DURATION (mm-ss):15-12

# HARRIS

## INJURY LAW

1645 Village Center Circle, Suite 60  
Las Vegas, Nevada 89134



MR. ERNEST JOHNSON, JR.



Electronically Issued  
1/6/2022 1:15 PM

**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

ERLINDA ZACARIAS; ERLINDA ZACARIAS  
as parent and guardian of [REDACTED]  
FRANCISCO ROCHA

**CASE NO: A-22-846332-C**  
Case No. Department 4  
Dept. No.

Plaintiffs,

vs.

ERNEST JOHNSON; JOWA TAX AND  
FINANCE, INC.; DOES 1 through 10; ROE  
CORPORATIONS 11-20, inclusive,

Defendants.

**SUMMONS - CIVIL**

**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR  
BEING HEARD UNLESS YOU RESPOND WITHIN 21 DAYS. READ THE INFORMATION BELOW.**

**TO THE DEFENDANT(S):** A civil Complaint has been filed by the Plaintiff(s) against you for the relief set forth  
in the Complaint.

**ERNEST JOHNSON**  
[REDACTED]

1. If you intend to defend this lawsuit, within 21 days after this Summons is served on you, exclusive of the day of service, you must do the following:
  - (a) File with the Clerk of this Court, whose address is shown below, a formal written response to the Complaint in accordance with the rules of the Court, with the appropriate filing fee.
  - (b) Serve a copy of your response upon the attorney whose name and address is shown below.
2. Unless you respond, your default will be entered upon application of the Plaintiff(s) and failure to so respond will result in a judgment of default against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint.
3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members and legislators each have **45 days** after service of this Summons within which to file an Answer or other responsive pleading to the Complaint.

DATED this 6 day of January, 2022.

Submitted By:

**BRIAN K. HARRIS, ESQ.**  
Nevada Bar No. 7737  
1645 Village Center Circle, Suite 60  
Las Vegas, Nevada 89134  
Attorney for Plaintiffs

STEVEN D. GRIERSON, CLERK OF THE COURT

By Laurie Williams 1/7/2022  
Deputy Clerk  
Regional Justice Center  
200 Lewis Avenue  
Las Vegas, Nevada 89155

05.25.16

Case Number: A-22-846332-C

**HARRIS**  
**INJURY LAW**

Electronically Filed  
1/6/2022 1:14 PM  
Steven D. Grierson  
CLERK OF THE COURT



**COMP**  
**BRIAN K. HARRIS, ESQ.**  
Nevada Bar No. 7737  
**HARRIS INJURY LAW**  
1645 Village Center Circle, Suite 60  
Las Vegas, Nevada 89134  
702.880.4529 - Telephone  
702.880.4528 - Facsimile  
[Brian@harrislawyers.com](mailto:Brian@harrislawyers.com)  
*Attorneys for Plaintiffs*

CASE NO: A-22-846332-C  
Department 4

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

ERLINDA ZACARIAS; ERLINDA ZACARIAS	)	Case No.
as parent and guardian of [REDACTED]	)	Dept. No.
FRANCISCO ROCHA	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	
ERNEST JOHNSON; JOWA TAX AND	)	
FINANCE, INC.; DOES 1 through 10; ROE	)	
CORPORATIONS 11-20, inclusive,	)	
	)	
Defendants.	)	

**COMPLAINT**

Plaintiffs allege as follows:

1. That at all times relevant hereto, Plaintiff **ERLINDA ZACARIAS**, was and is a resident of Clark County, State of Nevada.
2. That at all times relevant hereto, Plaintiff **ERLINDA ZACARIAS** as parent and guardian of [REDACTED] was and is a resident of Clark County, State of Nevada.
3. At all times mentioned herein, Plaintiff **FRANCISCO ROCHA** was and is a resident of Clark County, Nevada.
4. That at all times relevant hereto, Defendant **ERNEST JOHNSON**, was and is a resident of Harris County, State of Texas.

....

# HARRIS

## INJURY LAW

1           5. That at all times relevant hereto, Defendant **JOWA TAX AND FINANCE,**  
2 **INC.** is a Foreign Corporation doing business in Las Vegas, Clark County, Nevada.

3           6. That the identities of Defendants, DOES 1 through 10 and ROE  
4 CORPORATIONS 11 through 20, are unknown at this time and may be individuals,  
5 partnerships or corporations. Plaintiff alleges that each of the Defendants designated herein as  
6 DOE or ROE CORPORATION is responsible in some manner for the damages herein alleged.  
7 Plaintiffs request leave of the Court to amend this Complaint to name the Defendants  
8 specifically when their identities become known.

9           7. That all the facts and circumstances that give rise to the subject lawsuit occurred  
10 in Clark County, Nevada.

11           8. At all times relevant hereto, Defendants were the drivers, contractors,  
12 maintainers, owners, managers, inspectors, supervisors and controllers of the subject semi  
13 truck.

14           9. On or about June 8, 2021, Defendants, while in the course and scope of their  
15 employment and agency with other Defendants, negligently failed to properly control and  
16 operate the subject semi truck and further failed to use due care to Plaintiffs, by rear-ending the  
17 vehicle they were occupying causing serious injuries.

18           10. As a direct and proximate result, Plaintiffs were seriously and permanently  
19 injured to their general damage in an amount in excess of **FIFTEEN THOUSAND**  
20 **DOLLARS (\$15,000.00).**

21           11. As a further direct and proximate result, Plaintiffs incurred expenses for medical  
22 care and treatment and will incur expenses for future medical care and treatment.

23           12. As a further direct and proximate result, Plaintiffs sustained a loss of earnings  
24 and/or earning capacity.

25           13. As a further direct and proximate result, Plaintiffs were forced to retain the  
26 services of **HARRIS & HARRIS** to prosecute this matter.  
27  
28

# HARRIS

## INJURY LAW

WHEREFORE, Plaintiffs pray judgment of this Court as follows:

WHEREFORE Plaintiffs pray for Judgment against the Defendants, and each of them, as follows:

1. For general and compensatory damages in an amount in excess of **FIFTEEN THOUSAND DOLLARS (\$15,000.00)**;

2. Damages for cost of medical care and treatment and costs incidental thereto in an amount in excess of **FIFTEEN THOUSAND DOLLARS (\$15,000.00)**;

3. Damages for future cost of medical care and treatment and costs incidental thereto in an amount in excess of **FIFTEEN THOUSAND DOLLARS (\$15,000.00)**;

4. Damages for lost earnings and loss of future earning capacity in an amount in excess of **FIFTEEN THOUSAND DOLLARS (\$15,000.00)**;

5. Damages for past and future household services in excess of **FIFTEEN THOUSAND DOLLARS (\$15,000.00)**;

6. Damages for Plaintiffs' emotional distress, including, but not limited to pain and suffering and hedonic damages in an amount in excess of **FIFTEEN THOUSAND DOLLARS (\$15,000.00)**;

7. For reasonable attorney fees, costs of suit and interest incurred herein; and

8. For such other and further relief as the Court deems just and proper.

DATED this 6 day of January, 2022.

HARRIS INJURY LAW

By

**BRIAN K. HARRIS, ESQ.**

Nevada Bar No. 7737  
1645 Village Center Circle, Suite 60  
Las Vegas, Nevada 89134  
702.880.4529 - Telephone  
702.880.4528 - Facsimile  
*Attorneys for Plaintiffs*

**Steve Sisolak**  
Governor



**Julie Butler**  
Director

555 Wright Way  
Carson City, Nevada 89711  
Telephone (775) 684-4368  
dmvnev.com

February 7, 2022

Mr. Brian K. Harris, Esq.  
Harris Injury Law  
1645 Village Center Circle, Suite 60  
Las Vegas, Nevada 89134

Dear Mr. Harris:

Re: Erlinda Zacarias; Erlinda Zacarias as parent and guardian of [REDACTED] Francisco Rocha  
v. Ernest Johnson; Jowa Tax and Finance, Inc.; Does 1 through 10; Roe Corporations 11-20,  
inclusive,  
Case No. A-22-846332-C  
Service Date: 02/04/2022  
Service Accepted for: Ernest Johnson  
Delivery Method: Legal Process Service

This letter acknowledges service of a Summons and Complaint received in the Director's Office  
of the State of Nevada Department of Motor Vehicles for the above-referenced case along with  
\$5.00 as provided for in NRS 14.070.

Sincerely,

A handwritten signature in black ink, appearing to read "Amanda Otto". The signature is fluid and cursive, with a large loop at the end.

Amanda Otto  
Administrative Assistant  
Director's Office

